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COUNSEL TO ARCO DB COMPANIES, INC.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	Subchapter V
PRO CIV CONSTRUCTION, LLC, <i>et al.</i>	§	
	§	Case No. 24-31811-SGJ
	§	(Jointly Administered)
	§	Hearing Date: January 13, 2025
Debtors.¹	§	Hearing Time: 2:30 p.m.
	§	

ARCO DB COMPANIES, INC.'S WITNESS & EXHIBIT LIST

ARCO DB Companies, Inc. ("ARCO"), a party-in-interest of in the above-captioned jointly administered bankruptcy case (the "Bankruptcy Case"), files this its *Witness & Exhibit List* in connection with the hearings scheduled for January 13, 2025 at 2:30 pm (CT) (the "Hearings"), and respectfully states as follows:

WITNESSES

ARCO may call the following witnesses at the Hearings:

1. Kyle Lenamond, Debtors' Manager;
2. Any witness listed or called by another party;
3. Rebuttal witnesses as necessary; and

¹ The Debtors in these jointly chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Pro NRG Services, LLC (6816), and Pro Civ Construction, LLC (6509). The Debtors' mailing address is 3010 LBJ Freeway, Suite 1230, Dallas, Texas 75232.

4. ARCO reserves the right to cross-examine any witness called by any other party.

EXHIBITS

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER HEARING
ARCO-1	ARCO's Proof of Claim filed in Case No. 24-3811 [Claim No. 8]						
ARCO-2	ARCO's Proof of Claim filed in Case No. 24-31812 [Claim No. 4]						
ARCO-3	Copies of the pages of the website, attached as Exhibit 1A to the Motion ² [Dkt. No. 128-2]						
ARCO-4	Copies of the pages of the website, attached as Exhibit 1B to the Motion [Dkt. No. 128-3]						
ARCO-5	Subcontract, attached as Exhibit 2 to the Motion [Dkt. No. 128-4]						
ARCO-6	Change orders, attached as Exhibit 3 to the Motion [Dkt. No. 128-5]						
ARCO-7	W-9 forms, attached as Exhibit 4 to the Motion [Dkt. No. 128-6]						
ARCO-8	Requests for Payment, attached as Exhibit 5 to the Motion [Dkt. No. 128-7]						
ARCO-9	Waivers, attached as Exhibit 6 to the Motion [Dkt. No. 128-8]						
ARCO-10	First Amended Original Petition, attached as Exhibit 7 to the Motion [Dkt. No. 128-9]						
ARCO-11	Arbitration Award, attached as Exhibit 8 to the Motion [Dkt. No. 128-10]						
ARCO-12	Certificate, attached as Exhibit 9 to the Motion [Dkt. No. 128-11]						
ARCO-13	First pages to Transaction Reports, attached as Exhibit 10 to the Motion [Dkt No. 128-12]						
	Any document or pleading filed in the above-captioned bankruptcy case						
	Any exhibit necessary for impeachment and/or rebuttal purposes						

² ARCO DB Companies, Inc.'s Motion for Substantive Consolidation of Debtors' Estates (the "Motion").

	Any exhibit identified or offered by any other party						
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RESERVATION OF RIGHTS

ARCO reserves the right to call or introduce one or more, or none, of these witnesses and exhibits listed above, and further reserves the right to supplement and/or amend this Witness & Exhibit List prior to the Hearings.

Dated: January 10, 2025

By: /s/ Frances A. Smith
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COUNSEL TO ARCO DB COMPANIES

CERTIFICATE OF SERVICE

I certify that on January 10, 2025, I caused to be served the foregoing document via the Court's electronic filing system (with exhibits) and/or U.S. mail (without exhibits) upon the parties listed in the attached Master Service List as indicated.

/s/ Frances A. Smith
Frances A. Smith

Master Service List
PRO CIV CONSTRUCTION, LLC, *et al.*
Case No. 24-31811

Debtors:

Pro NRG Services, LLC
5827 Clendenin Ave.
Dallas, Texas 75228
Notice via U.S. Mail

Pro Civ Construction, LLC
5827 Clendenin Ave.
Dallas, Texas 75228
Notice via U.S. mail

Debtor's Counsel:

Eric Haitz
Bonds Ellis Eppich Schafer Jones LLP
420 Throckmorton St
Suite 1000
Fort Worth, Texas 76102
(817) 454 8792
Email: eric.haitz@bondsellis.com
Notice via ECF

US Trustee:

Meredyth A. Kippes
1100 Commerce Street, Room 976
Dallas, Texas 75202
Phone: (214) 767 8967
Email: meredyth.kippes@usdoj.gov
Notice via ECF

Subchapter V Trustee:

Katharine B. Clark -SBRA V
Thompson Coburn LLP
2100 Ross Avenue, Suite 3200
Dallas, TX 75201
Phone: (972) 629-7100
Email: kclark@thompsoncoburn.com
Notice via ECF

JD & Son Trucking Enterprises, LLC
18170 Dallas PWY #501
Dallas, TX 75287
Notice via U.S. mail

Top 20 Unsecured Creditors:

3Paz Trucking, LLC
2300 Valley View Ln
Suite #612
Irving, TX 75062
Notice via U.S. mail

Advantage Equipment
15850 Highway 377
Fort Worth, TX 76126
Notice via U.S. mail

Ash Grove Cement Company
PO Box 204069
Dallas, TX 75320-4069
Notice via U.S. mail

B&R Equipment
PO Box 2707
Keller, TX 76244
Notice via U.S. mail

Caterpillar Finance
PO Box 735638
Dallas, TX 75373-5638
Served via U.S. mail

Hewitt Farm Supply
PO Box 1152
Gilmer, TX 75644
Notice via U.S. mail

HSM Edifice Construction Services
403 A/B, Subhashish Square
Plot no 57
Madhav Nagar, Nagpur 440010
Notice via U.S. mail

Iron Smart Machinery LLC
3737 Lamar Ave., Ste 700
Paris, TX 75460
Notice via U.S. mail

Kirby Smith
PO Box 270360
Oklahoma City, OK 73137
Notice via U.S. mail

Longview Truck Center
3132 TX-31
Longview, TX 75603
Notice via U.S. mail

Martin Marietta Materials
PO Box 677061
Dallas, TX 75267-7061
Notice via U.S. mail

Mica Enterprises, LLC
PO Box 131
Carthage, TX 75633
Notice via U.S. mail

ML3 Solutions
PO Box 31
Krum, TX 76249
Notice via U.S. mail

Power Plan
8402 Excelsior Drive
PO Box 5328
Madison, WI 53705-0328
Notice via U.S. mail

RDO Equipment Co.
PO Box 7160
3230 East Airport Freeway
Irving, TX 75062
Notice via U.S. mail

Roadstar Management, LLC
5326 W. Ledbetter Dr.
Dallas, TX 75236
Notice via U.S. mail

Sunbelt Rentals, Inc
PO Box 409211
Atlanta, GA 30384-9211
Notice via U.S. mail

Tarango Trucking, LLC
PO Box 177786
Irving, TX 75017-7786
Notice via U.S. mail

U.S. Lime Company
P.O. Box 201752
Dallas, TX 75320-1752
Notice via U.S. mail

Governmental Agencies:
Internal Revenue Service
Special Procedures – Insolvency
P.O. Box 7346
Philadelphia, PA 19101-7346
Notice via U.S. mail

Office of the Attorney General
Bankruptcy-Collections Division
P.O. Box 12548
Austin, TX 78711-2548
Notice via U.S. mail

Texas Workforce Commission
TEC Building-Bankruptcy
101 East 15th Street
Austin, TX 78778
Notice via U.S. mail

U.S. Attorney's Office
Northern District of Texas
Attn: Civil Process Clerk
1100 Commerce St., Third Floor
Dallas, TX 752242
Notice via U.S. mail

Noticed Parties:

Rusk County
c/o John Kendrick Turner
Linebarger Goggan Blair & Sampson, LLP
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Dallas, Texas 75207
(214) 880-0089
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Email: dallas.bankruptcy@lgbs.com
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Attn: Brian J. Wagner, Esq.
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Dallas, Texas 75201
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(469) 619-5725
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c/o Douglas A. Ritcheson
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821 ESE Loop 323, Suite 530
Tyler, Texas 75701
(903) 535-2900
(903) 533-8646
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Union Leasing, Inc.
d/b/a Express 4x4 Truck Rental
c/o Padfield & Stout, LLP
Attn: Christopher V. Arisco
Jessica N. Alt
100 Throckmorton Street, Suite 700
Fort Worth, Texas 76102
Telephone: (817) 338-1616
Facsimile: (817) 338-1610
Email: carisco@padfieldstout.com
Email: jalt@padfieldstout.com
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Comptroller of Public Accounts,
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Assistant Attorney General
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Texas Attorney General's Office
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P.O. Box 12548
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Email: jalt@padfieldstout.com
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